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Share your opinions

EPA invites your comments on this proposed cleanup plan from June 1 to June 30, 2023. There are three ways for you to submit comments:

- Fill out and return the enclosed comment sheet.
- Orally or in writing at the public meeting.
- On the internet at www.epa.gov/superfund/matthi essen-hegeler-zinc

Proposed plan meeting June 14th, 6 p.m.

LaSalle Peru Township High School (Auditorium) 541 Chartres St. LaSalle, IL

After a brief presentation, U.S. EPA will accept comments on the proposed plan. A court reporter will record the meeting and all comments.

Contact information Ruth Muhtsun

Community Involvement Coordinator 312-886-6595 muhtsun.ruth@epa.gov

Demaree Collier

Remedial Project Manager 312-886-0214 collier.demaree@epa.gov

You may call U.S. EPA toll-free at 800-621-8431, 9 a.m. – 4:30 p.m., weekdays

EPA Proposes Plan for Groundwater Cleanup

Matthiessen & Hegeler Zinc Co.

LaSalle, IL June 2023

U.S. Environmental Protection Agency is proposing changes to the cleanup plan selected in the 2017 Record of Decision (ROD) of the Matthiessen and Hegeler Zinc Co. (M&H) site. A ROD is a public document that explains which cleanup alternatives were selected for a Superfund site. U.S. EPA is proposing a short-term groundwater remedy to prevent exposure from direct contact with contaminated groundwater. This temporary plan will give the agency time to evaluate source-control remedies before selecting a final cleanup plan for groundwater contamination at the site. U.S. EPA will make these changes in accordance with state requirements identified as potential applicable and/or relevant and appropriate requirements (ARARs) relating to groundwater at the M&H site.

U.S. EPA will also update the 2017 ROD to define wastes found at industrial portions of the site as low-level threat wastes and not principal threat wastes. Principal threat waste are materials that are highly toxic or mobile that cannot be contained and low-level threat wastes are materials that can be contained and would present a minimal risk if released. According to the regulations that identify the threat levels of hazardous materials, the contaminated soil and the process residue source materials at the M&H site should be considered low-level threat waste materials. This is because they will be reliably contained and would not present a significant risk to human health and the environment in the event of a release. Updating the 2017 ROD would also clarify state requirements for closure and post-closure care of landfills at the M&H Site.

Your comments are needed

Before making a final decision, U.S. EPA will seek comments from the public (see box, left). Following the conclusion of the public comment period, the federal Agency will then prepare a "responsiveness summary" of public comments to the recommended alternative and U.S. EPA's response. The responsiveness summary will be included in a decision document known as a "Record of Decision Amendment", or ROD Amendment, which outlines the decision process and cleanup alternative selected.

In consultation with Illinois EPA, U.S. EPA may modify its cleanup plan or choose a new one based on public comments or new information. Your opinion is important. We encourage you to review and comment on the proposed cleanup change. U.S. EPA will notify the public of the ROD Amendment by placing an ad in the local newspaper and updating our webpage.

Remedial alternatives are evaluated based on the nine criteria set forth in the National Oil and Hazardous Substances Pollution Contingency Plan. A remedial alternative is first judged in terms of the threshold criteria of protecting human health and the environment and complying with ARARs (Applicable or Relevant and Appropriate Requirements). If a proposed remedy meets these two threshold criteria, the remedial alternative is then evaluated under the balancing and modifying criteria, to arrive at a final recommended alternative.

EPA evaluated three alternatives in this Proposed Plan against the nine criteria listed in the table below to achieve the RAOs for the Matthiessen and Hegeler Zinc Co. Site:

- Alternative 1 No Action
- Alternative 2 Institutional Controls (ICs) and Groundwater Monitoring

EVALUATION CRITERIA FOR SUPERFUND REMEDIAL ALTERNATIVES

Threshold Criteria

- 1. Overall Protection of Human Health and the Environment determines whether an alternative eliminates, reduces, or controls threats to the public health and the environment through engineering controls, treatment, or ICs.
- 2. Compliance with Applicable or Relevant and Appropriate Requirements (ARARs) evaluates whether the alternative meets federal and state environmental statutes, regulations, and other requirements that pertain to the site, or whether a waiver is justified.

Balancing Criteria

- **3. Long-term Effectiveness and Performance** considers the ability of an alternative to maintain protection of human health and the environment over time.
- **4. Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment** evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.
- **5. Short-term Effectiveness** considers the length of time needed to implement an alternative and the risks the alternative poses to workers, residents, and the environment during implementation.
- **6. Ability to Implement** considers the technical and administrative feasibility of implementing the alternative, including factors such as relative availability of goods and services.
- 7. **Cost** includes estimated capital and annual operation and maintenance costs, as well as present worth cost. Present worth cost is the total of an alternative over time in today's dollar value. Cost estimates are expected to be accurate within a range of +50% to -30%.

Modifying Criteria

- **8. State Acceptance** considers whether the State agrees with U.S. EPA's analyses and recommendations, as described in the Proposed Plan.
- **9. Community Acceptance** considers whether the local community agrees with U.S. EPA's analyses and Preferred Alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.

Description of remedial alternatives

Alternative 1: No Action

EPA's Superfund guidance generally requires that the "No Action" alternative be evaluated to establish a baseline for comparing the action alternatives. Under Alternative 1, EPA would take no further action at the site for groundwater cleanup.

Estimated Capital Cost: \$0
Estimated Annual O&M Cost: \$0
Estimated Present Worth Cost: \$0
Estimated Construction Timeframe: None

<u>Alternative 2</u>: Institutional Controls (ICs) and Groundwater Monitoring

The proposed interim remedy for site groundwater would consist of ICs to prohibit access to and use of contaminated groundwater at the M&H site. U.S. EPA will also assist Illinois EPA as that agency establishes a groundwater management zone that would match the boundary of the groundwater contamination at the M&H site. Additional ICs would be required for any areas of the site where contamination remains above levels that allow for unlimited use and unrestricted exposure.

Estimated Capital Cost: \$1,000,000 Estimated Annual O&M Cost: \$80,000 Estimated Present Worth Cost: \$1,080,000 Estimated Construction Time: 1 month

Comparative analysis of groundwater remedial alternatives

1) Overall Protection of Human Health and the Environment

Alternative 1 does not protect human health and the environment because taking no action will not provide monitoring to ensure that contaminants do not exceed unsafe levels or migrate off-site.

Alternative 2 would prevent human exposure to contaminated groundwater at the M&H site and adjacent areas until a final remedy is selected. Results from previous sampling have shown low levels of contamination in the groundwater. Additionally, the city of LaSalle has an existing ordinance prohibiting the drilling of water supply wells throughout the city. The city ordinance covers the M&H site and adjacent areas. Groundwater from the site is not used as a drinking water supply.

2) Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)

Alternative 1 would not comply with ARARs because no action would be taken to achieve the federal and state requirements with respect to groundwater cleanup goals.

Alternative 2 would ensure that state requirements relating to closure and post-closure care of landfills would protect both human health and the environment at the M&H Site. The final groundwater remedy, once selected and implemented, is expected to comply with all identified groundwater ARARs.

3) Long-term Effectiveness and Permanence

Alternative 1 would not be effective in the long term because no actions would be taken.

Alternative 2 is effective in the long term by ensuring that state requirements relating to the closure and post-closure care of landfills would provide long-term protection and effectiveness at the M&H site.

4) Short-term Effectiveness

Alternative 1 would not be an effective alternative because current risks would not be monitored and controlled accordingly.

Alternative 2 would pose limited risks to the public, workers or the environment during the installation of monitoring wells, implementation of ICs, and associated groundwater monitoring.

5) Ability to Implement

Alternative 1 is the most easily implemented because it involves taking no action.

Alternative 2 is ready to implement. Qualified contractors are available to perform groundwater monitoring activities, including monitoring well installation, land surveying, groundwater sampling, and sample analysis. ICs to restrict use of contaminated groundwater M&H site will also be easy to implement.

6) Cost

Alternative 1 is the least expensive alternative because it would require no further action.

Alternative 2 has limited costs relating to installation of groundwater wells and monitoring.

7) State Acceptance

Illinois EPA supports the inclusion of the interim groundwater remedy, changing the designation of principal threat waste to low-level threat waste and ensuring that all landfills comply with state regulations for closure and post-closure care of landfills.

8) Community Acceptance

EPA will evaluate community acceptance of the recommended alternative after the public comment period ends. EPA will evaluate and consider public comments and place a summary of all comments received and EPA's responses to the comments in the Responsiveness Summary section of the ROD Amendment.

EPA's recommended alternative

Based on all the above information, and in consultation with Illinois EPA, the recommended alternatives would be the inclusion of an interim groundwater remedy, clarification of ARARs for closure and post-closure care of landfills and changing the designation of principal threat waste to low-level threat waste.

Illinois EPA as the support agency concurs with U.S. EPA's recommended alternative. U.S. EPA may modify the recommended alternative in response to public comments or if new information is received.

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Address_____City_____State___Zip_____

Matthiessen and Hegeler Zinc Co. - Comment Sheet

Ruth Muhtsun
Community Involvement Coordinator
U.S. EPA Region 5
Community Involvement and
Outreach Section (RE-19J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Share your opinion

EPA encourages the public to comment on any aspects of the proposed changes to the Matthiessen and Hegeler Zinc Co. Superfund site remedy and will consider comments received during the 30-day public comment period. Your input helps U.S. EPA determine the best course of action. You may fill out and mail the enclosed form. Comments must be postmarked by **June 30, 2023,** and sent to:

Ruth Muhtsun U.S. Environmental Protection Agency, Mail Code RE-19J 77 West Jackson Blvd. Chicago, IL 60604

You can submit comments via email to: muhtsun.ruth@epa.gov or on the web at: www.epa.gov/superfund/matthiessen

Following the conclusion of the public comment period on the Proposed Plan, U.S. EPA will prepare a summarized response to comments on the agency's preferred alternative. This summary will be included in a formal decision document that details the decision process and the cleanup alternative selected for the site.

For further information on the Matthiessen and Hegeler Zinc Co. Superfund site, please contact:

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Phone: (312) 886-0214

Upcoming Public Meeting

You are invited to a public meeting to make your voice heard about EPA's proposed plan.

LaSalle Peru Township High School (Auditorium)

541 Chartres St.
LaSalle, IL
June 14, 2023
Public Meeting: 6 p.m.

www.epa.gov/superfund/matthiessen-hegeler-zinc

Matthiessen & Hegeler Zinc Co. Superfund Site: EPA Proposes Plan for Groundwater Cleanup

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United States Environmental Protection Agency

